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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christoper Kohls,

Plaintiff,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**Stipulation to stay enforcement
of AB 2655**

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Plaintiffs,

v.

Rob Bonta, et al.

Defendants.

STIPULATION

1. Defendants Rob Bonta and Shirley N. Weber agree to stay enforcement of AB 2655 (Cal. Elec. Code § 20510) during the law's operative dates for the 2024 election cycle, from January 1-4, 2025.

2. In light of this stipulation, Plaintiffs will not seek a preliminary injunction staying enforcement of AB 2655 during the 2024 election cycle. Plaintiffs reserve the right to bring a motion for preliminary injunction should enforcement later become a possibility which, absent a dispositive ruling from this Court, will occur no later than late 2025 due to primary elections for the 2026 election cycle.

1 DATED: November 14, 2024

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3 s/ Johannes Widmalm-Delphonse

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christoper Kohls,

Plaintiff,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**[PROPOSED] ORDER to stay
enforcement of AB 2655**

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Plaintiffs,

v.

Rob Bonta, et al.

Defendants.

Before the Court are Plaintiff Christopher Kohls, Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert and Defendants Rob Bonta and Shirley N. Weber's joint stipulation to stay enforcement of AB 2655.

The Court thus hereby ORDERS Defendants Rob Bonta and Shirley N. Weber to stay of enforcement of AB 2655 during the 2024 election cycle, from January 1-4, 2025.

It is so ORDERED.

DATED: _____, 2024

The Honorable John A. Mendez
Senior United States District Judge

PROOF OF SERVICE

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 14th day of November, 2024.

s/ Johannes Widmalm-Delphonse
Johannes Widmalm-Delphonse
Counsel for Plaintiffs The Babylon
Bee, LLC and Kelly Chang Rickert